

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

RIMMAX WHEELS, LLC, a)
Delaware limited liability
company)
Plaintiff,)
vs.) C.A. No. 06-029 (SLR)
RC COMPONENTS, INC.,)
a Kentucky corporation,)
Defendant.)

AFFIDAVIT OF MICHAEL RIVERS

I, Michael Rivers, being duly sworn on oath depose and say:

1. I serve as co-president of RiMMax Wheels, LLC, the plaintiff in the above-captioned action.
2. I received training and certifications from the United States Air Force in the area of aviation engineering.
3. In 2002, Marc Mathis and I requested from the United States Patent Office a provisional patent on spinning rims for motorcycles. This rim is similar to spinning wheels on automobiles. We applied this idea to motorcycles.
4. In 2002 and 2003, I had many verbal conversations (in person and via telephone) and written communications with employees of RC Components, Inc. about the technical design of RiMMax's spinning rims for motorcycles. During all of these

communications, I made it clear that all information I was sharing about the spinning rims for motorcycles, including the drawings I gave to RC Components, was confidential and was being shared for the sole purpose of facilitating RC Components' manufacture of RiMMax's spinning rims.

5. Many of my communications were with an RC Components' employee named Chuck. I believe his last name is Skarsaune.

6. I also spoke directly with Rick Ball, president of RC Components, specifically telling him all the information I was sharing about the spinning rim was confidential. Rick Ball told me he understood the information was confidential and would be used only for the purpose of helping RiMMax manufacture and deliver the spinning rim to RiMMax customers.

7. Rick Ball told me RC Components did not currently possess the technical capability to manufacture the spinning rim and needed to have me work closely with RC Components' engineer (Chuck) as we moved through the final product development and testing stages. Rick Ball also told me that he did not have the tooling equipment necessary to manufacture the spinning rim. RiMMax agreed to and did pay thousands of dollars for this special tooling.

8. The spinner RC Components now is selling is the same spinner I designed and for which I hold patents.

9. Essentially, RC Components intentionally misled me into believing that if I shared my spinning rim idea with it then it would manufacture the spinning rim for RiMMax. Instead, RC Components stole my idea and made over \$1 million in sales. I have lost my money and time. My dream of benefiting from my hard work and good idea

has been shattered. I have suffered financially and emotionally as a result of the wrongful conduct of RC Components.

MICHAEL RIVERS

Subscribed and sworn to before me this ____ day of January 2007.

____ Notary Public.

State of ____.

[SEAL]